

FILED

2013 OCT -2 AM 9:40

U.S. BANKRUPTCY COURT
DISTRICT OF ARIZONA

45
1 Rachael Earl
1311 South Claiborne Avenue
2 Gilbert, Arizona 85296
rachael.earl@gmail.com
3 480-654-1120
PRO SE LITIGANT
4

5
6 **IN THE UNITED STATES BANKRUPTCY COURT**
7 **FOR THE DISTRICT OF ARIZONA**

8 RACHAEL EARL,

9
10 Plaintiff,

11 vs.

12 US BANK NATIONAL ASSOCIATION AS
13 TRUSTEE FOR GSAA 2007-9 BY ITS
14 ATTORNEY IN FACT WELLS FARGO
15 BANK N.A., SUCCESSOR BY MERGER TO
16 WELLS FARGO HOME MORTGAGE INC.,
17 MICHAEL A. BOSCO, JR. AS TRUSTEE,
PAULA GRUNTMEIR, MARICOPA
COUNTY NOTARY PUBLIC, AND DOES
1-10,000;

18 Defendants.
19

Case Number: 2:10-BK-27333

Adversary Number: 2:10-AP-02243

**PLAINTIFF'S REQUEST FOR
RELIEF FROM A JUDGMENT OR
ORDER PURSUANT TO RULE
9024**

**REQUEST FOR EXPEDITED
RULING AND/OR HEARING**

20 Plaintiff, Rachael Earl, hereby requests the Court to vacate the order signed on
21 November 20, 2012, which dismissed Plaintiff's Adversary Proceeding with prejudice,
22 and requests a hearing based upon newly acquired evidence and declarations and
23 evidence of fraud upon the Court. In the alternative, requests that the Court revise its
24 order to dismiss all Defendants to the complaint *without* prejudice based upon fraud
25 perpetrated by the Defendants with regards to the timestamp at issue in Plaintiff's
26 complaint. Plaintiff attaches the declarations of computer expert Brooks Hilliard, and
27
28

1 private investigator Ken McLeod in support of her motion. Plaintiff additionally requests
2 an expedited ruling and/or expedited hearing in this matter, as Plaintiff has been served
3 with a Writ of Restitution requiring that she vacate her home by 10:00 AM on October
4 30, 2013. Plaintiff is currently still in possession of her property located at 1311 South
5 Claiborne Avenue, Gilbert, Arizona 85296. A forced eviction emanating from the
6 fraudulent acts and fraudulently secured forcible entry and detainer judgment procured by
7 the Defendants, and all of them, would cause irreparable harm to Plaintiff and her family.
8 Plaintiff is additionally due to deliver a baby at the end of October, and for this additional
9 reason respectfully requests an expedited ruling and/or expedited hearing in this matter.
10
11
12

13 MEMORANDUM OF POINTS AND AUTHORITIES

14
15 On November 14, 2012, a hearing was held in Plaintiff's Adversary Proceeding.
16 Plaintiff was unaware that the hearing was going forward and had not been told to attend
17 the hearing by her former counsel, Mr. Jensen, who also did not attend.

18 On November 20, 2012, the Court signed an order dismissing Plaintiff's case with
19 prejudice citing non-appearance by the Plaintiff at the hearing and lack of new evidence
20 in support of her allegations. Plaintiff has since requested that her counsel withdraw
21 from the case, which he has.
22

23 Plaintiff now attaches to this motion the declaration of private investigator, Ken
24 McLeod, and the expert report of computer forensics expert, Brooks Hilliard (Attached as
25 **Exhibits 1 and 2 respectfully**) as evidence of fraud upon the Court in the previous
26 hearings, which caused the Court to dismiss her Amended Adversary Complaint.
27
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1 Plaintiff originally stated that the digital time stamps of Michael Bosco and Paula
2 Gruntmeir on the Trustee's Deed Upon Sale (Attached as **Exhibit 3**) recorded against her
3 property were created using Chosen Security, one of the approved time stamp providers
4 of the Arizona Secretary of State, based upon statements made by Ms. Gruntmeir herself
5 under oath (Attached as **Exhibit 4**) and based upon submission of these documents into
6 evidence by counsel for the Defendants.
7

8 Plaintiff made this representation in reliance on the under oath statement of Paula
9 Gruntmeir made to the Secretary of State in her response to Plaintiff's complaint against
10 her notary commission (See **Exhibit 4**). Plaintiff had a right to rely on this under oath
11 representation by Ms. Gruntmeir that she was using an approved timestamp provider,
12 which is why Plaintiff made this representation to the Court. The Secretary of State on
13 their website lists only two timestamp token providers that it approves for use in Arizona
14 by those complying with the digital signature statutes of the state: Chosen Security and
15 Verisign¹. Plaintiff therefore focused her investigation initially based upon the
16 representation by Ms. Gruntmeir and counsel for the Defendants that the timestamp
17 provider was Chosen Security.
18
19
20

21 However, since that representation, Plaintiff has hired both Mr. McLeod and Mr.
22 Hilliard to research the origination of the purported "digital signature", the time
23 referenced in the time stamp on the document, and if the purported "digital signature" is
24 capable of verification.
25
26

27 ¹ See < <http://www.azsos.gov/pa/approved-ca-list.htm>>.
28

1 Plaintiff hired private investigator Ken McLeod to investigate the “electronic
2 signatures” and time stamp information to see if the signatures were verifiable within
3 Chosen Security’s database². Mr. McLeod searched the Chosen Security database for
4 any evidence that Ms. Gruntmeir, Mr. Bosco, or any employee of Tiffany & Bosco ever
5 had a digital signature with Chosen Security. Mr. McLeod also searched the database for
6 other known Arizona digital signers, Bethany Smith, Kirt Larsen, Ashley Stone, and S.
7 Kline. (See **Exhibit 1**)
8

9
10 Mr. McLeod began with the known digital signers Smith, Larsen, Stone, and Kline
11 (See **Exhibit 1 at number 5**). All of the signers’ electronic signatures were verifiable
12 within the Chosen Security and/or Verisign databases³, which pulled detailed information
13 verifying that their electronic signatures were in fact validly issued. (See **Exhibit 1**).
14

15 Mr. McLeod then focused his search on Paula Gruntmeir and Michael A. Bosco,
16 Jr. to see if they had valid, verifiable digital signatures listed in the databases. According
17 to Mr. McLeod, “I used every permutation of the name Paula Gruntmeir I could think of
18 as well as her employer name, Tiffany & Bosco; the names of Michael A. Bosco Jr., and
19 Mark S. Bosco, and Mott Blake, a second notary employed by Tiffany & Bosco.
20 Regardless of how I spelled, concatenated, expanded, or searched all or parts of these
21 names, I could NOT LOCATE a digital signing certificate in the Verisign/Symntec
22
23

24
25 ² Chosen Security’s database can be accessed at the following internet link:

26 <<https://www.trustcenter.de/cgi-bin/Search.cgi?Language=en>>.

27 ³ Verisign’s database can be accessed at the following internet link:

28 <https://securitycenter.verisign.com/celp/enroll/outsideSearch?application_locale=VRSN_US>.

1 TrustCenter authentication database or the Chosen TrustCenter authentication database”
2 (See **Exhibit 1 at number 21**).

3 Mr. McLeod further states, “In summary, I was able to quickly and accurately
4 locate the digital signing certificates of four randomly provided e-notaries or e-signers”
5 (See **Exhibit 1 at number 22**). However, “after diligent search I was unable to locate
6 any information that Paula Gruntmeir or Michael A. Bosco, Jr. has or ever had a digital
7 signing certificate with Chosen Security” (See **Exhibit 1 at number 25**).

8
9 Plaintiff then sought the expertise of local computer forensic expert, Brooks
10 Hilliard. Mr. Hilliard makes two opinions with regards to the alleged digital signatures:

11
12 1. “The date/time stamp in the electronic signatures for Mr. M. Bosco
13 and Ms. P. Gruntmeir on the Trustee’s Deed Upon Sale number
14 20100036162 refers to 4:50 AM, Mountain Standard time on 14 January
15 2010, not 4:50 PM.” (See **Exhibit 2 at Page 3**)

16
17 2. “The electronic signature stamps for Mr. M. Bosco and Ms. P.
18 Gruntmeir on the Trustee’s Deed Upon Sale number 20100036162 do
19 not comply with a recognized format and do not provide a reliable
20 and independently verifiable authentication of the documents
21 having been digitally signed by Mr. Bosco and Ms. Gruntmeir. (See
22 **Exhibit 2 at Page 3**)

23
24 Mr. Hilliard goes on to state that, “Digital signatures are issued by certifying
25 authorities to provide a verifiable means of determining the authenticity and
26 accuracy of the documents to which they are affixed. This is done using a
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1 mathematical process, such that anyone receiving such a document can
2 independently (a) verify the date and time the document was signed, and (b)
3 determine whether the document has been altered in any way since the digital
4 signature was affixed⁴. (See Exhibit 2 at Page 4)

5
6 It can only be concluded that under oath statements of Paula Gruntmeir used to
7 persuade the Secretary of State to allow her to retain her notary commission were false,
8 and were intended to mislead the Court, the Secretary of State and Attorney General that
9 the signatures were in compliance with statutory requirements and created by an
10 approved timestamp token provider, when in fact they were not.

11
12 Under A.R.S. § 41-121, the Secretary of State has a statutory duty to “accept, and
13 approve for use, electronic and digital signatures that comply with section 41-132 for
14 documents filed with and by all state agencies, boards and commissions.” A.R.S. § 41-
15 132 further defines an electronic signature: “An electronic signature shall be unique to
16 the person using it, **shall be capable of reliable verification and shall be linked to a**
17 **record in a manner so that if the record is changed the electronic signature is**
18 **invalidated.**” A.R.S. § 41-132 (B) (emphasis added).

19
20
21 The Secretary of State’s office seems to have taken Ms. Gruntmeir’s word for it
22 that she was using a “valid” and “verifiable” Chosen Security digital signature, and did
23 not investigate whether the signatures were capable of reliable verification and linked to a
24 valid record. The “digital signatures” of Michael Bosco and Paula Gruntmeir, however,
25

26
27 ⁴ See National Institute of Standards and Technology (NIST) Digital Signature Standard,
28 19 May 1994 <<http://www.itl.nist.gov/fipspubs/fip186.htm>>.

1 are **not** verifiable and are **not** linked to any verifiable record and are therefore **not**
2 statutorily acceptable as electronic signatures.

3 The **only** conclusion that can be reached is that the Trustee's Deed Upon Sale in
4 this case is invalid and void, as the time stamp on the document would reference an
5 illegal sale of Plaintiff's property nearly five hours before it is statutorily legal to do so
6 under A.R.S. § 33-808(A)(4) ("The sale shall be held at a time and place designated in
7 the notice of sale on a day other than a Saturday or legal holiday between 9:00 a.m. and
8 5:00 p.m. mountain standard time."), signatures that do not fall within the standards set
9 forth in A.R.S. § 41-132 for acceptable digital signatures, and the perjury of Ms.
10 Gruntmeir in her under oath statements to the Secretary of State and the Attorney General
11 that she used Chosen Security, an approved time stamp authority, when it is clear that she
12 did not, nor has ever used Chosen Security or any approved digital signature provider.

13 If the sale was held outside of the hours statutorily allowed for a sale, the sale
14 would be void, not voidable, as a matter of law, and therefore, the Court's determination
15 that ARS § 33-811(C) bars Plaintiff's claims would be inaccurate, as ARS § 33-811 (C)
16 would only apply if there was a valid, binding, legal sale of the property, which there was
17 not. The provisions in ARS § 33-811 (C) should not even be a factor in this case, and
18 would not even be reached, as other statutes were not first complied with to make the
19 "sale" of Plaintiff's property legal in the first place.

20 Additionally, the Court initially dismissed Plaintiff's case with prejudice based
21 upon the recently published case at the time of Madison v. Groseth, 279 P. 3d 633 – Ariz:
22 Court of Appeals, 1st Div., Dept. A 2012, based upon the provisions in A.R.S. § 33-
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1 811(C), which required Plaintiff to obtain an injunction against the sale of her property
2 by 5:00PM the day before the sale occurred. Should the Court determine that ARS § 33-
3 811 (C) still somehow applies to the illegal sale, however, the more recently released
4 decision in Grady v. Tri-City Nat. Bank, 2013 WL 2147541 states that certain facts and
5 claims associated with foreclosure do survive A.R.S. § 33-811(C), including facts and
6 claims specifically pled by Plaintiff in this case such as lack of default and lack of notice
7 of the sale. *Id* at *4 (citing Martenson v. RG Financing, 2010 WL 334648, *8
8 (D.Ariz.2010)).
9

10
11 Furthermore, in the very recently released opinion in Stauffer v. US Bank National
12 Association, Ariz: Court of Appeals, 1st Div., Dept. A 2013, the Court determined that
13 fraudulent or forged documents filed against a property warrant the filing of an action for
14 Quiet Title by a homeowner because the recorded documents are interests in the property
15 and a homeowner is considered an “owner” under A.R.S. § 33-420, and is subsequently
16 damaged by the filings, as Plaintiff has claimed in the case at hand. These claims, as
17 pled, should therefore pass the muster of Defendants’ Motion to Dismiss and should not
18 have been dismissed with prejudice.
19

20
21 For these reasons, Plaintiff requests that the Court vacate its order dismissing the
22 case with prejudice so that the Plaintiff can finally adjudicate her claims against the
23 Defendants, and requests a hearing on the matter where Plaintiff’s expert witnesses can
24 appear to testify. In the alternative, Plaintiff requests that the Court dismiss the case
25 without prejudice so that the Plaintiff can adjudicate her claims in a State Court action.
26 Plaintiff additionally requests an expedited order and/or hearing in this matter due to the
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1 impending threat of eviction from her home, which she is in possession of, and the fact
2 that she is eight months pregnant and due to deliver her baby at the end of October.
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4

5 DATED this 2nd day of October, 2013
6
7

8
9 By Rachael Earl
10 Rachael Earl
11
12

13
14 **ORIGINAL** of the foregoing mailed
this 2nd day of October to:

15 **U.S. BANKRUPTCY COURT**
16 **DISTRICT OF ARIZONA**
17 230 North First Avenue, Suite 101
Phoenix, Arizona 85003-1727

18 **Steven D. Jerome**
19 **SNELL & WILMER L.L.P.**
20 One Arizona Center
400 E. Van Buren
21 Phoenix, Arizona 85004-2202
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EXHIBIT 1

1 Rachael Earl
1311 South Claiborne Avenue
2 Gilbert, Arizona 85296
rachael.earl@gmail.com
3 480-654-1120
4

5 **IN THE UNITED STATES BANKRUPTCY COURT**
6 **FOR THE DISTRICT OF ARIZONA**
7

9 RACHAEL EARL,

10 Plaintiff,

11 vs.

12 US BANK NATIONAL ASSOCIATION AS
13 TRUSTEE FOR GSAA 2007-9 BY ITS
14 ATTORNEY IN FACT WELLS FARGO
15 BANK N.A., SUCCESSOR BY MERGER TO
16 WELLS FARGO HOME MORTGAGE INC.,
17 MICHAEL A. BOSCO, JR. AS TRUSTEE,
18 PAULA GRUNTMEIR, MARICOPA
19 COUNTY NOTARY PUBLIC, AND DOES
20 1-10,000;

21 Defendants.
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Case Number: 2:10-BK-27333

Adversary Number: 2:10-AP-02243

**DECLARATION OF KEN
MCLEOD**

Declaration of Kenneth McLeod

I, Kenneth McLeod, declare as follows:

1. I am an Arizona Licensed Private Investigator. Arizona Department of Public Safety Identification Number: 1624426.
2. I am over the age of 18 and competent to testify in a court of law. I have personal knowledge of the facts set forth in this Declaration.
3. I was contacted by Mr. Dan Earl and asked to determine if a Notary Public, Ms. Paula Gruntmeier, who was an electronic notary public authorized by the State of Arizona to sign documents electronically had a digital certificate issued by a company called "Chosen Security"; and, if Mr. Michael A. Bosco, Jr., an electronic signer had a digital certificate issued by a company called "Chosen Security". Mr. Earl provided me with a certified copy of a document on-file with the Maricopa County Recorder that had an exemplar of the electronic signatures of Ms. Gruntmeier and Mr. Bosco. A certified copy of the Gruntmeier/Bosco document can be located on the on-line system of the Maricopa County Recorder as document number 2010-0035162, and, is attached hereto as Exhibit B. Mr. Earl also provided me with a copy of a release of a medical lien, electronically signed by "S. Kline" and an "Ashley Stone". A certified copy of the Kline/Stone document is attached hereto as Exhibit C.
4. Concurrently Mr. Earl provided me with a document electronically signed by two electronic notaries, Bethany Smith and Kit Larsen, both of whom had signed documents electronically. A certified copy of this document is attached as Exhibit A and can be located on the on-line system of the Maricopa County Recorder as document number 2010-1081104.
5. I decided to determine a positive, that is, to query the Verisign and/or Chosen Security TrustCenter digital certificate databases for results on the names of Smith, Larsen, Kline and/or Stone.
6. The Verisign/Symantec TrustCenter Digital Certificate database is located at this web address:
https://securitycenter.verisign.com/celp/enroll/outsideSearch?application_locale=VRSN_US
7. This is a cut and paste of the electronic signature for Bethany Smith, which is contained on Exhibit A.

Bethany Smith

Digitally signed by Bethany Smith
o="VeriSign Inc.", ou=2.16.840.1.113733.1.7.23.1,
cn=Bethany Smith, email=bsmith@ingeo.com
Date: 12/13/2010 11:58:36 AM

Bethany Smith Assistant Secretary

8. Using the Chosen Digital Certificate Verification System, the link to which is shown in paragraph 6, I was able to locate the following information for e-notary Bethany Smith.

Verify Certificate

Common Name: Bethany Smith
Status: **Expired**
Validity (GMT): Oct 10, 2011 - Oct 11, 2012
Class: Digital ID Class 1 - Client
Authentication Full Service New
Organization: VeriSign, Inc.
Organizational Unit: VeriSign Trust Network
www.verisign.com/repository/RPA
Incorp. by Ref.,LIAB.LTD(c)98
Persona Not Validated
Digital ID Class 1 - Microsoft Full
Service
State:
City/Location:
Country:
Serial Number: 32a859c698919a792d050a4e3930e996
Issuer Digest: 8cd9af1f0c36d5c37827db0cf3840c0b

Verify Certificate

Common Name: Bethany Smith
Status: **Expired**
Validity (GMT): Oct 12, 2010 - Oct 12, 2011
Class: Digital ID Class 1 - Client
Authentication Full Service New
Organization: VeriSign, Inc.
Organizational Unit: VeriSign Trust Network
www.verisign.com/repository/RPA
Incorp. by Ref.,LIAB.LTD(c)98
Persona Not Validated
Digital ID Class 1 - Microsoft Full

Service

State:

City/Location:

Country:

Serial Number: 68068fc0dbd0f5eeca5abffc52619b

Issuer Digest: 16ac5ba1864129ae8cfc6125d7e92f80

Verify Certificate

Common Name: Bethany Smith

Status: **Expired**

Validity (GMT): Jan 6, 2010 - Jan 6, 2011

Class: Digital ID Class 2 - OnSite Subscriber

Organization: Options and Choices, Inc.

Organizational Unit: Information Management Solutions

www.verisign.com/repository/CPS

Incorp. by Ref., LIAB.LTD(c)99

Company - Unum

Phone Number - 207-575-2881

State:

City/Location:

Country:

Serial Number: 53fdfa9930e49da1533211ffa124d4db

Issuer Digest: d627ddc890c29683c40a4f0c13d772e8

9. The above information regarding Bethany Smith shows that she had a VALID and traceable digital signing certificate on the date she signed Exhibit A.

10. This is a cut and paste of the electronic signature for Kit Larsen, which is contained on Exhibit A

Kirt Larsen

Digitally notarized by Kirt Larsen

o="VeriSign Inc.", ou=2.16.840.1.113733.1.7.23.1.

cn=Kirt Larsen, email=klarsen@ingeo.com

Date: 12/13/2010 12:01:04 PM

Notary Public: Kirt Larsen

My Commission Expires: 05/19/2014

Resides in: Cache

11. Using the Chosen Digital Certificate Verification System, the link to which is shown in paragraph 6, I was able to locate the following information for e-notary Kit Larsen.

Verify Certificate

Common Name: Kit Larsen

Status: **Expired**

Validity (GMT): May 30, 2007 - May 30, 2008

Class: Digital ID Class 1 - Client
Authentication Full Service New

Organization: VeriSign, Inc.

Organizational Unit: VeriSign Trust Network
www.verisign.com/repository/RPA
Incorp. by Ref.,LIAB.LTD(c)98
Persona Not Validated
Digital ID Class 1 - Microsoft Full
Service

State:

City/Location:

Country:

Serial Number: 6f3e6958506de35ee888c1bd17e2a261

Issuer Digest: 35b4baa315f6d785eb6f9753fd386976

Verify Certificate

Common Name: Kit Larsen

Status: **Expired**

Validity (GMT): May 18, 2006 - May 31, 2007

Class: Digital ID Class 1 - Client
Authentication Full Service New

Organization: VeriSign, Inc.

Organizational Unit: VeriSign Trust Network
www.verisign.com/repository/RPA
Incorp. by Ref.,LIAB.LTD(c)98
Persona Not Validated
Digital ID Class 1 - Microsoft Full
Service

State:

City/Location:

Country:

Serial Number: 53066cde8c8460dac75d6ea3fed73548

Issuer Digest: 0bdc466a3b854a164f9f6fb8751ce08d

12. **The above information regarding Kit Larsen shows that he had an INVALID and EXPIRED but traceable digital signing certificate on the date he signed Exhibit A.**
13. **This is a cut and paste of the electronic signature for Paula Gruntmeier, which is contained on Exhibit B.**



Digitally signed by Paula
Gruntmeir
DN: c=US o=Tiffany & Bosco
P.A. ou=10/23/11, email=
Date: 2010.01.14 04:50:37 -
07:00

Notary Public for the said County and State
My Commission Expires: October 23rd, 2011

14. This is a cut and paste of the electronic signature for Michael A. Bosco Jr., which is contained on Exhibit B.

**Michael A.
Bosco, Jr.**

Digitally signed by Michael A.
Bosco, Jr.
DN: c=US o=Tiffany & Bosco P.A.
ou=Tiffany & Bosco, P.A., email=
Date: 2010.01.14 04:50:37 -07:00

Michael A. Bosco, Jr.

15. Using the Verisign Digital Certificate Verification System and the Chosen Security Digital Certificate Verification System (link at end of this paragraph), the Verisign link to which is shown in paragraph 6. I was **unable to locate** ANY information regarding an invalid, expired or current digital certificate for e-notary Paula Gruntmeier or Michael A. Bosco Jr. (Note: Chosen Security was purchased by Verisign/Symantec). Chosen maintains a web site at this link for certificates issued (historically by Chosen):

<https://www.trustcenter.de/fcgi-bin/Search.cgi?Language=en>

16. This is a cut and paste of the electronic signature for S. Kline which is contained on Exhibit C.

S. Kline

Digitally signed by S. Kline
DN: c=US, st=Arizona, l=Phoenix,
o=Southwest Medical Services,
Inc., cn=S. Kline
Date: 2010.02.10 12:57:38 -07'00'

S. KLINE, Agent

17. This is a cut and paste of the electronic signature for Ashley Stone which is contained on Exhibit C.

**Ashley
Stone**

Digitally signed by Ashley Stone
DN: c=US, st=Arizona, l=Phoenix,
o=Southwest Medical Services, Inc.,
ou=2/19/2013, ou=505079, ou=http://
www.azsos.gov/notary/notlookup.asp?
commission=505079, cn=Ashley Stone
Date: 2010.02.10 12:35:30 -08'00'

Notary Public for the said County and State
My Commission expires: February 19, 2013

18. Using the Verisign Digital Certificate Verification System and the Chosen Security Digital Certificate Verification System (link at end of this paragraph), the Verisign link to which is shown in paragraph 6, I was **able to easily locate** digital certificates issuing by Chosen Security for Kline and Stone, which is shown below, at this link: <https://www.trustcenter.de/fcgi-bin/Search.cgi?Language=en>

19. This is the digital certificate for Ashley Stone, which is attached as Exhibit D.

Certificate data

Owner (DN): C=US, SP=Arizona, L=Phoenix, O=Southwest Medical Services, Inc., CN=Ashley Stone

Issuer (DN): C=DE, O=TC TrustCenter GmbH, OU=TC TrustCenter Class 2 L1 CA, CN=TC TrustCenter Class 2 L1 CA XI

Type of X.509
certificate:

Serial number: 0x18D7000100023C8F1906B9379E49 (503811886637173999594203187224137)

Status: Not revoked

Not valid 06/27/2011 22:27:54 CEST
before:

Not valid after: 06/27/2013 22:27:49 CEST

Fingerprint: 90:72:1A:BC:D2:0E:10:85:B0:37:CF:88:C4:13:9A:FE
(MD5)

Fingerprint: 8F:A4:08:C5:B9:12:AD:D0:4C:75:34:3A:D4:50:79:1B:4A:2C:3C:E5
(SHA1)

Fingerprint: 8C:50:37:83:B3:B8:FD:EC:39:91:A8:65:34:11:4F:52:3D:1A:A1:E4
(RIPEMD-160)

Group TC Open Group, TC Public LDAP

Certificate data

Owner (DN): C=US, SP=Arizona, L=Phoenix, O=Southwest Medical Services, Inc., OU=2/19/2013,
OU=505079, OU=<http://www.azsos.gov/notary/notlookup.asp?commission=505079>,
CN=Ashley Stone

Issuer (DN): C=DE, O=TC TrustCenter GmbH, OU=TC TrustCenter Class 2 L1 CA, CN=TC TrustCenter
Class 2 L1 CA XI

Type of X.509
certificate:

Serial 0x6A92000100026603D7965BF186A3 (2161502730923129722285900233279139)
number:

Status: Not revoked

Not valid 12/08/2011 21:29:29 CET
before:

Not valid 12/08/2013 21:29:16 CET
after:

Fingerprint: C1:89:00:E7:C3:87:63:6C:A1:49:4B:CE:5E:CD:C7:02
(MD5)

Fingerprint: FE:18:18:2E:64:4D:CC:DC:FD:BF:F9:6E:51:E5:12:F1:AB:32:70:CB
(SHA1)

Fingerprint: 23:B4:E2:9B:CC:24:8D:AE:17:30:68:B7:E6:52:F7:33:BC:D3:97:F2
(RIPEMD-
160)

Group TC Open Group

20. This is the digital certificate for S. Kline, which is attached as Exhibit E.

Certificate data

Owner (DN): C=US, SP=Arizona, L=Phoenix, O=Southwest Medical Services, Inc., OU=7/10/12,
OU=287868, OU=<http://www.azsos.gov/notary/notlookup.asp?commission=287868>, CN=S.
Kline

Issuer (DN): C=DE, O=TC TrustCenter GmbH, OU=TC TrustCenter Class 2 L1 CA, CN=TC TrustCenter
Class 2 L1 CA XI

Type of X.509
certificate:

Serial 0x70E700010002EB8CDED51CF0803E (2289931582358761835755079937851454)
number:

Status: Not revoked

Not valid 12/07/2011 22:26:11 CET
before:

Not valid after: 12/07/2013 22:26:00 CET

Fingerprint: 9C:71:02:75:1D:94:E1:C9:2F:E0:E9:26:1F:34:D9:C4
(MD5)

Fingerprint: 8E:18:E6:97:39:81:50:15:DE:F9:D5:85:9F:84:4C:F9:5B:05:34:38
(SHA1)

Fingerprint: F9:06:EB:BA:4E:0E:29:08:9B:8E:79:56:C0:6B:C3:E0:E4:4C:9B:C4
(RIPEMD-160)

Group TC Open Group

Certificate data

Owner (DN): C=US, SP=Arizona, L=Phoenix, O=Southwest Medical Services, Inc., CN=S. Kline

Issuer (DN): C=DE, O=TC TrustCenter GmbH, OU=TC TrustCenter Class 2 L1 CA, CN=TC
TrustCenter Class 2 L1 CA XI

Type of X.509
certificate:

Serial number: 0xAC15000100026A0CF757EA610B27 (3490238244449857218865792945294119)

Status: Not revoked

Not valid 02/16/2012 18:40:59 CET
before:

Not valid after: 02/16/2014 18:40:47 CET

Fingerprint: 64:9A:27:10:C6:C5:4E:CE:40:C4:5C:EF:F3:68:F7:B1
(MD5)

Fingerprint: E6:15:96:88:4E:DF:81:F6:64:24:D1:05:81:2A:5F:6E:3C:70:B2:4F
(SHA1)

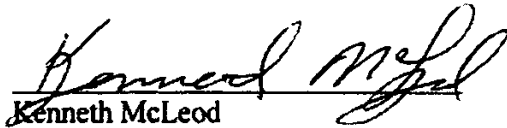
Fingerprint: 9D:5D:DD:76:7D:6D:1F:57:E5:C5:83:F1:CE:94:11:AA:6D:49:CA:F3
(RIPEMD-160)

Group TC Open Group, TC Public LDAP

21. I used every permutation of the name Paula Gruntmeier I could think of as well as her employer name. Tiffany & Bosco: the names of Michael A. Bosco Jr, and Mark S. Bosco, and Mott Blake, a second e-notary formerly employed by Tiffany & Bosco. Regardless of how I spelled, concatenated, expanded, or searched all or parts of these names, I could **NOT LOCATE** a digital signing certificate in the Verisign/Symantec TrustCenter authentication database or the Chosen TrustCenter authentication database.

22. In summary, I was able to quickly and accurately locate the digital signing certificates of four randomly provided e-notaries or e-signers.
23. The Chosen security digital certificate of e-signor S. Kline contains a direct link to the Arizona Secretary of State Notary lookup system.
24. The Chosen Security digital certificate of e-signor Ashley Stone contains a direct link to the Arizona Secretary of State Notary lookup system
25. After diligent search I was unable to locate any information that Paula Gruntmeier or Michael A. Bosco Jr. has or ever had a digital signing certificate with Chosen Security.
26. I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 and Arizona Rule of Civil Procedure 80(i), that the foregoing is true and correct.

Signed this 20th day of March, 2013.


Kenneth McLeod

Certificate search

Full details of the certificate

Certificate data

Owner (DN): C=US, SP=Arizona, L=Phoenix, O=Southwest Medical Services, Inc.,
CN=S. Kline

Issuer (DN): C=DE, O=TC TrustCenter GmbH, OU=TC TrustCenter Class 2 L1 CA,
CN=TC TrustCenter Class 2 L1 CA XI

Type of X.509
certificate:

Serial 0xAC15000100026A0CF757EA610B27
number: (3490238244449857218865792945294119)

Status: Not revoked

Not valid 02/16/2012 18:40:59 CET
before:

Not valid 02/16/2014 18:40:47 CET
after:

Fingerprint: 64:9A:27:10:C6:C5:4E:CE:40:C4:5C:EF:F3:68:F7:B1
(MD5)

Fingerprint: E6:15:96:88:4E:DF:81:F6:64:24:D1:05:81:2A:5F:6E:3C:70:B2:4F
(SHA1)

Fingerprint: 9D:5D:DD:76:7D:6D:1F:57:E5:C5:83:F1:CE:94:11:AA:6D:49:CA:F3
(RIPEMD-160)

Group TC Open Group, TC Public LDAP

Certificate
management:

Show

PEM

DER

PKCS7

Match

Certificate search

Full details of the certificate

Certificate data

Owner (DN): C=US, SP=Arizona, L=Phoenix, O=Southwest Medical Services, Inc.,
OU=7/10/12, OU=287868, OU=http://www.azsos.gov/notary
/notlookup.asp?commission=287868, CN=S. Kline

Issuer (DN): C=DE, O=TC TrustCenter GmbH, OU=TC TrustCenter Class 2 L1 CA,
CN=TC TrustCenter Class 2 L1 CA XI

Type of certificate: X.509

Serial number: 0x70E700010002EB8CDED51CF0803E
(2289931582358761835755079937851454)

Status: Not revoked

Not valid before: 12/07/2011 22:26:11 CET

Not valid after: 12/07/2013 22:26:00 CET

Fingerprint: 9C:71:02:75:1D:94:E1:C9:2F:E0:E9:26:1F:34:D9:C4
(MD5)

Fingerprint: 8E:18:E6:97:39:81:50:15:DE:F9:D5:85:9F:84:4C:F9:5B:05:34:38
(SHA1)

Fingerprint: F9:06:EB:BA:4E:0E:29:08:9B:8E:79:56:C0:6B:C3:E0:E4:4C:9B:C4
(RIPEMD-160)

Group: TC Open Group

Certificate management:

Show

PEM

CER

PXCS7

Install

Certificate search:

Full details of the certificate

Certificate data

Owner (DN): C=US, SP=Arizona, L=Phoenix, O=Southwest Medical Services, Inc.,
OU=2/19/2013, OU=505079, OU=http://www.azsos.gov/notary
/notlookup.asp?commission=505079, CN=Ashley Stone

Issuer (DN): C=DE, O=TC TrustCenter GmbH, OU=TC TrustCenter Class 2 L1 CA,
CN=TC TrustCenter Class 2 L1 CA XI

Type of certificate: X.509

Serial number: 0x6A92000100026603D7965BF186A3
(2161502730923129722285900233279139)

Status: Not revoked

Not valid before: 12/08/2011 21:29:29 CET

Not valid after: 12/08/2013 21:29:16 CET

Fingerprint: C1:89:00:E7:C3:87:63:6C:A1:49:4B:CE:5E:CD:C7:02
(MD5)

Fingerprint: FE:18:18:2E:64:4D:CC:DC:FD:BF:F9:6E:51:E5:12:F1:AB:32:70:CB
(SHA1)

Fingerprint: 23:B4:E2:9B:CC:24:8D:AE:17:30:68:B7:E6:52:F7:33:BC:D3:97:F2
(RIPEMD-160)

Group: TC Open Group

Certificate management:



Certificate details

Full details of the certificate

Certificate data

Owner (DN): C=US, SP=Arizona, L=Phoenix, O=Southwest Medical Services, Inc.,
CN=Ashley Stone

Issuer (DN): C=DE, O=TC TrustCenter GmbH, OU=TC TrustCenter Class 2 L1 CA,
CN=TC TrustCenter Class 2 L1 CA XI

Type of certificate: X.509

Serial number: 0x18D7000100023C8F1906B9379E49
(503811886637173999594203187224137)

Status: Not revoked

Not valid before: 06/27/2011 22:27:54 CEST

Not valid after: 06/27/2013 22:27:49 CEST

Fingerprint: 90:72:1A:BC:D2:0E:10:85:B0:37:CF:88:C4:13:9A:FE
(MD5)

Fingerprint: 8F:A4:08:C5:B9:12:AD:D0:4C:75:34:3A:D4:50:79:1B:4A:2C:3C:E5
(SHA1)

Fingerprint: 8C:50:37:83:B3:B8:FD:EC:39:91:A8:65:34:11:4F:52:3D:1A:A1:E4
(RIPEMD-160)

Group TC Open Group, TC Public LDAP

Certificate management: [redacted] [redacted] [redacted] [redacted]
[redacted]

When recorded e-mail to:

sk@swmsinc.com
(602) 424-0229

RELEASE OF MEDICAL LIEN

S. Kline, as agent for Gilbert Emergency Medicine Specialists, L.L.C. releases that certain lien dated FEBRUARY 18, 2009, and recorded on FEBRUARY 18, 2009, document no. 20090138009, in the Office of the County Recorder of Maricopa County, Arizona, against MARISSA RAMIREZ (138896) who has stated that the liable and responsible party to be MARISSA RAMIREZ (138896) in the amount of \$ Approx. 500.00.

Dated this 10th day of FEBRUARY, 2010

S. Kline

S. KLINE Agent

Digitally signed by S. Kline
DN: c=US, st=Arizona, l=Phoenix,
o=Southwest Medical Services,
inc., cn=S. Kline
Date: 2010.02.10 12:57:38 -0700

SUBSCRIBED and sworn to before me this 10th day of FEBRUARY, 2010

**Ashley
Stone**

Digitally signed by Ashley Stone
DN: c=US, st=Arizona, l=Phoenix,
o=Southwest Medical Services, Inc.,
ou=2/19/2013, ou=505079, ou=http://
www.azsos.gov/notary/notlookup.asp?
commission=505079, cn=Ashley Stone
Date: 2010.02.10 12:35:30 -0800

Notary Public for the said County and State
My Commission expires: February 19, 2013

20100114534
OFFICIAL RECORDS OF
MARICOPA COUNTY RECORDER
HELEN PURCELL



The foregoing instrument is an
electronically prepared
full, true and correct copy
of the original record in this
office.

Attest: 03/20/2013 02:25:01 PM

Document Prepared by:
ReconTrust Company, N.A.

When recorded return to:
TIMOTHY M SMITH
2454 7th St
Livermore CA 94550

DOCID_0001387038762005N

Investor Loan #:
Pool #:
PIN#: 30913023
MERS ID:
MERS Telephone:
Property Address:
1141 E Washington Ave
Gilbert AZ 85234

Deed of Release and Reconveyance

THE UNDERSIGNED, Mortgage Electronic Registration Systems, Inc. , whose address is 4 New York Plaza New York NY 10004 , holder of the Note mentioned below, secured by the Deed of Trust described below does hereby certify that the same has been paid in full and the lien therein created and retained is hereby released:

Original Grantor(S): TIMOTHY M SMITH
Original Trustee(S):
Original Beneficiary: Mortgage Electronic Registration Systems, Inc.

Amount of Note:
\$229600.00

Date of Note: 06/02/2006

Original Recording Date:
06/07/2006

Original Deed Book: Original Page: Original Instrument No: 20060770243

and recorded in the records of the Recorder's Office, County of Maricopa, State of AZ affecting Real Property and more particularly described on said Deed of Trust referred to herein.

IN WITNESS WHEREOF, the undersigned has caused this instrument to be executed on this date of 12/12/2010 .

Mortgage Electronic Registration Systems, Inc.

Bethany Smith

Digitally signed by Bethany Smith
o="VeriSign Inc.", ou=2.16.840.1.113733.1.7.23.1,
cn=Bethany Smith, email=bsmith@ingeo.com
Date: 12/13/2010 11:58:36 AM

Bethany Smith Assistant Secretary

State of UT
City/County of Cache

On this date of 12/12/2010 , before me, the undersigned authority, a Notary Public duly commissioned, qualified and acting within and for the aforementioned State, personally appeared the within named Bethany Smith , known to me (or identified to me on the basis of satisfactory evidence) that he/she is the Assistant Secretary , of Mortgage Electronic Registration Systems, Inc. , and was duly authorized in his/her capacity to execute the foregoing instrument for and in the name and on behalf of said corporation, and that said corporation executed the same, and further stated and acknowledged that he/she had so signed, executed and delivered said instrument for the consideration, uses and purposes therein mentioned and set forth.

Witness my hand and official seal on the date hereinabove set forth.

Kirt Larsen

Digitally notarized by Kirt Larsen
o="VeriSign Inc.", ou=2.16.840.1.113733.1.7.23.1,
cn=Kirt Larsen, email=klarsen@ingeo.com
Date: 12/13/2010 12:01:04 PM

20101081104
OFFICIAL RECORDS OF
MARICOPA COUNTY RECORDER
HELEN PURCELL



The foregoing instrument is an
electronically prepared
full, true and correct copy
of the original record in this
office.

Attest: 03/20/2013 09:04:40 AM

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EXHIBIT 2

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**Expert Report of Brooks L. Hilliard CCP, CMC
Business Automation Associates, Inc.
Phoenix, Arizona**

In the matter of:

Rachel Earl

vs.

**Michael A. Bosco; Tiffany & Bosco, P.A.
and
John and Jane Doe I–V**

**Case No. CV 2013–093062
Superior Court
Maricopa County, Arizona**

September 23, 2013

Business Automation Associates, Inc.
11811 North Tatum Boulevard, Suite 3011, Phoenix, AZ 85028
Phone (602) 264-9263 On the web: <http://www.computerexpertwitness.com> Facsimile (602) 532-7244

INTRODUCTION:

This report states and explains my opinions in the matter of Rachael Earl (hereafter "Earl") v. Michael A. Bosco; Tiffany & Bosco P.A.; et. al. ("Bosco"); Case CV 2013-093062, Superior Court, Maricopa County, Arizona. It is offered to address specific issues, as requested by counsel for Rachael Earl.

PERSONAL BACKGROUND:

Over the course of the past 32 years, I have been engaged as an expert witness / consultant in more than 120 legal disputes, including more than 50 matters where I was engaged to do apply my expertise with regard to computer forensics, electronic discovery and electronic document authentication. I have been engaged by and testified for both counsel for the plaintiffs and defendants in these matters. Although most of the cases where I was engaged have been settled out of court, I have given deposition, trial, hearing and arbitration testimony more than 40 times.

I am one of fewer than fifteen professionals in the world to be both a Certified Management Consultant (see Exhibit #1) and a Certified Computing Professional (see Exhibit #2). My educational background includes an M.B.A. from Harvard Business School and a Baccalaureate degree in mechanical engineering with Deans' List academic honors from the Massachusetts Institute of Technology. In addition, I have lectured on computer systems and programming for the Arizona State University School of Business and the American Management Association. Prior to founding Business Automation Associates in 1980, I held both line and staff positions for several major computer companies where I had responsibilities in the areas of designing, developing, marketing and supporting a wide variety of computer products used in both business and government applications. A copy of my professional biography is attached (see Exhibit #3).

In addition to my full-time consulting activities, I have served as a member of the Arizona State Bar Technology Task Force, written a book on computer selection (published by Dow Jones), published my own hard copy and electronic computer newsletters, provided commentary on computer issues for the nationally-syndicated MARKETPLACE news program on Public Radio

Business Automation Associates, Inc.

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International, conducted seminars, spoken professionally on various computer issues and been active in several civic organizations. I am serving currently as the Chairman of the Ethics Committee for the Institute of Management Consultants USA. I am also a past Board of Directors member for the Institute of Management Consultants USA, the Arizona Harvard Business School Alumni Association, the Arizona Chapter of the National Conference of Christians and Jews, Devereux Foundation (Arizona), Junior Achievement of Central Arizona and the Phoenix 100 Rotary. Business Automation also maintains membership in the Arizona Technology Council and the Independent Computer Consultants Association, and I am a member of the IEEE.

OPINIONS:

Based on my review of the facts in this case, I have reached two opinions, as stated below. The evidence on which I relied to reach these opinions is explained in the "Basis for Opinions" section below.

Opinion #1: The date/time stamp in the electronic signatures for Mr. M. Bosco and Ms. P. Gruntmeir on the Trustee's Deed Upon Sale number 20100036162 refers to 4:50 AM, Mountain Standard time on 14 January 2010, not 4:50 PM.

Opinion #2: The electronic signature stamps for Mr. M. Bosco and Ms. P. Gruntmeir on the Trustee's Deed Upon Sale number 20100036162 do not comply with a recognized format and do not provide a reliable and independently verifiable authentication of the documents having been digitally signed by Mr. Bosco and Ms. Gruntmeir.

PROCEDURES:

In order to reach the opinions above, I reviewed and relied on the documents and sources cited in this report.

It is my normal practice, when rendering opinions in legal matters, to use a rigorous and standardized methodology and, since my opinions in this matter address areas that require specialized computer and software industry knowledge, I have taken care to explain critical computer industry terms of art in a manner that does not favor either plaintiff or defendant. As is my normal practice, I have taken care to apply my expertise related to the computer industry customs and practices and accepted standards of care relevant to this matter in an objective manner.

BASIS FOR OPINIONS:

Opinion #1: The date/time stamp in the electronic signatures for Mr. M. Bosco and Ms. P. Gruntmeir on the Trustee's Deed Upon Sale number 20100036162 refers to 4:50 AM, Mountain Standard time on 14 January 2010, not 4:50 PM.

As requested, I have reviewed the Trustee's Deed Upon Sale for Rachael A. Earl, recorded at the Maricopa County Recorder's office on 15 January 2010 with the document number 20100036162, Exhibit #4. In so doing, I have paid particular attention to the purported digital signatures of Mr. Michael A. Bosco, Jr. and Ms. Paula Gruntmeir shown on page 2 of that document.

Digital signatures are issued by certifying authorities to provide a verifiable means of determining the authenticity and accuracy of the documents to which they are affixed. This is done using a mathematical process, such that anyone receiving such a document can independently (a) verify the date and time the document was signed, and (b) determine whether the document has been altered in any way since the digital signature was affixed.¹

It is my understanding that the purported digital signatures of Mr. Bosco and Ms. Gruntmeir have been represented to have been issued by the Chosen

¹ See National Institute of Standards and Technology (NIST) Digital Signature Standard, 19 May 1994 <<http://www.itl.nist.gov/fipspubs/fip186.htm>>.

Security TrustCenter, a recognized digital signature issuer in Arizona in 2010.²

Based on my analysis of the purported digital signatures of Mr. Bosco and Ms. Gruntmeir in comparison with the standard format for Chosen Security TrustCenter digital signatures, it is my considered opinion that the date/time stamps reflect a signing time of 04:50:37 am Mountain Standard Time on 14 January 2010. This is determined from the fact that the "-07:00" suffix of "2010.01.14 04.50.37 -07:00" date/time stamps is indicative of the Mountain Standard Time zone, seven time zones to the west of the Greenwich Mean Time zone.³

Had these date time stamps in the purported digital signatures for Mr. Bosco and Ms. Gruntmeir been meant to refer to 04:50:37 pm Mountain Standard Time on 14 January 2010, the standard way of signifying that in a digital signature would have been "2010.01.14 16.50.37 -07:00".

Opinion #2: The electronic signature stamps for Mr. M. Bosco and Ms. P. Gruntmeir on the Trustee's Deed Upon Sale number 20100036162 do not comply with a recognized format and do not provide a reliable and independently verifiable authentication of the documents having been digitally signed by Mr. Bosco and Ms. Gruntmeir.

In addition to examining two date time/stamps in the purported digital signatures of Mr. Bosco and Ms. Gruntmeir, I have also reviewed the standard format for the Chosen Security TrustCenter⁴ and noted that the two purported digital signatures fail to conform to its standard format in three ways:

- Chosen Security is not indicated as the issuer of either digital signature.

² See <http://www.azsos.gov/pa/ChosenSecurity_CA_Info.htm>.

³ See WC3 Date Time formats <<http://www.w3.org/TR/NOTE-datetime>>.

⁴ See <<http://www.chosensecurity.com>>.

- The "Oranizational Unit" designation (*i.e.*, "=ou") for Ms. Gruntmeir's purported digital signature is "10/34/11" instead of being a valid organizational unit.
- The "email=" values for both Mr. Bosco's and Ms. Gruntmeir's purported digital signatures are both blank instead of being a valid e-mail address as they should be.

I have also reviewed the Declaration of Mr. Kenneth McLeod dated 20 March 2013, Exhibit #5, and have relied on (but not independently verified) paragraphs 13, 14, 15, 21 and 25 of that Declaration.

Based on my reviews of Exhibits #4 and #5, it is my considered opinion that the two purported digital signatures affixed to Exhibit #1 do not comply with the normal format for a digital signature issued by the Chosen Security TrustCenter and do not provide a reliable and idependently verifiable authentication of the documents having been digitally signed by Mr. Bosco and Ms. Gruntmeir on 14 January 2010 in the form reproduced in Exhibit #4.

PUBLICATIONS

I have authored a book, "Buying a Computer for Your Growing Business, An Insider's Guide," which was published by Dow Jones-Irwin in 1984. I have also published Seven Critical Areas: Increasing the Effectiveness of Expert Testimony, For The Defense, July 2011.

PRIOR TESTIMONY

Within the past four years, I have testified in the following cases:

- Epicor Software Corp. v. Team Alloys LLC; District Court of Harris County, Texas (deposition testimony).
- AMC Technology LLC v. Cisco Systems, Inc.; United States District Court, Northern District of California, San Jose Division (deposition testimony).

Business Automation Associates, Inc.

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- Oracle USA, Inc., et. al. v. Rimini Street, et. al.; United States District Court; District of Nevada (deposition testimony).
- PC Onsite v. Massage En V; AAA, Phoenix, Arizona Office (deposition and arbitration testimony).
- Prodomax Automation, Inc. v. Encompix, Inc.; AAA, Cincinnati, Ohio office (deposition testimony).
- ePlus v. Lawson; United States District Court; Eastern District of Virginia (deposition and trial testimony).
- A series of individual arbitrations between Dealer Computer Systems [a/k/a Ford Dealer Computer Systems] and various automobile dealerships⁵ before the AAA, Houston, Texas office; (deposition and arbitration testimony).
- Axway, Inc. v. DHL Express (USA); United States District Court, District of Arizona (deposition testimony).
- AOL v. Accenture; State of Virginia, Fairfax County Circuit Court (deposition and trial testimony).
- Summit Electric Supply Company v. International Business Machines Corporation; United States District Court, District of New Mexico (deposition testimony).

⁵ Republic Ford, Butler Ford, Allan Vigil Ford, Hammonasset Ford, Saybrook Ford, Laird-Noller Ford, Pavilion Lincoln-Mercury, Northwood Lincoln-Mercury, Carey-Paul Ford, Kemp Ford, Classic Ford Lincoln Mercury, Randall Ford et. al. (Class Action suit), Griffin Ford, Michael Motors Company, Oasis Ford, Golden Eagle Motors and John Chandler Ford.

CONCLUSION

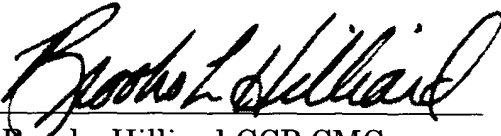
If additional facts are uncovered as a result of the discovery process in this matter, I reserve the right to add to and/or amend this report. I have reached my opinions to a reasonable degree of professional certainty and am willing to testify to them in a court of law.



Brooks Hilliard is one of fewer than 15 consultants in the world to have achieved both the Certified Management Consultant (CMC) and Certified Computing Professional (CCP) designations, the only internationally recognized certifications in each field.

To achieve this distinction, Mr. Hilliard has undergone peer reviews, client audits, competency tests and oral interviews; he has complied with continuing education requirements and has pledged to uphold the Codes of Ethics for both organizations.

Dated this 23rd day of September 2013

By 
Brooks Hilliard CCP CMC

Business Automation Associates, Inc.

11811 North Tatum Boulevard, Suite 3011, Phoenix, AZ 85028

Phone (602) 264-9263 On the web: <http://www.computerexpertwitness.com> Facsimile (602) 532-7244

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EXHIBIT 3

WHEN RECORDED MAIL TO :

Tiffany & Bosco, P.A.
2525 E. Camelback Rd.
Ste. 300
Phoenix, AZ 85016

OFFICIAL RECORDS OF
MARICOPA COUNTY RECORDER

HELEN PURCELL
20100035162 01/15/2010 08:31
ELECTRONIC RECORDING

2900234TD-3-1-1--
sarabiam

Forward Tax Statements to :
Wells Fargo Home Mortgage Inc
3476 Stateview Boulevard, MAC #X7801-014
Fort Mill, SC 29715

T & B File # 09-40173 Conv
Mortgage Co.# 0159737428
Title Co. # 2900234

EXEMPT TRANSACTION – NO AFFIDAVIT
ARS 11-1134 (B)(1)

Great American Title Agency, Inc.

TRUSTEE'S DEED UPON SALE

Michael A. Bosco, Jr. , as the duly appointed Trustee (or successor Trustee or Substituted Trustee), under a Deed of Trust referred to below, and herein called "Trustee", does hereby grant without any covenant or warranty to :

US Bank National Association, as Trustee for GSAA 2007-9

herein called Grantee, the following described real property situated in **Maricopa** County, described as :

See Attachment "A"

This conveyance is made pursuant to the powers including the power of sale conferred upon Trustee by said Deed of Trust executed **Rachael A. Earl, a married woman as her sole and separate property** , as Trustor, recorded on **04/17/07**, Instrument No./Docket-Page: **2007-0446763** Official Records in the Office of the County Recorder of **Maricopa** County, **AZ** and in compliance with the laws of the State of Arizona authorizing this conveyance.

http://recorder.maricopa.gov/vcl.aspx?ID=42047201000351624 pages

Said property was sold by Trustee at Public auction on January 14, 2010, at the place named in the Notice of Trustee's Sale. "Grantee", being the highest bidder at such sale, became the purchaser of said property and made payment thereof to said Trustee for the amount bid, namely \$315,000.00, which payment was made either entirely in cash or by the satisfaction, protanto, of the obligation then secured by said Deed of Trust, together with the foreclosure and expenses relative thereto.

IN WITNESS WHEREOF, MICHAEL A. BOSCO, JR., as Trustee, has this day caused his name to be hereunto affixed.

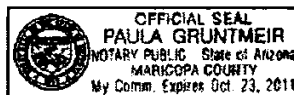
**Michael A.
Bosco, Jr.**

Digitally signed by Michael A.
Bosco, Jr.
DN: c=US o=Tiffany & Bosco P.A.
ou=Tiffany & Bosco, P.A., email=
Date: 2010.01.14 04:50:37 -07:00

State of Arizona)
)ss.
County of Maricopa)

Michael A. Bosco, Jr.

The foregoing instrument was acknowledged before me this 14th day of January, 2010, by Michael A. Bosco, Jr., as Trustee.



Digitally signed by Paula
Gruntmeir
DN: c=US o=Tiffany & Bosco
P.A. ou=10/23/11, email=
Date: 2010.01.14 04:50:37 -
07:00

Notary Public for the said County and State
My Commission Expires: October 23rd, 2011

Trustee's Deed
Attachment "A"
09-40173

Lot 196, AGRITOPIA, PHASE 2A, according to Book 691 of Maps, Page 4, and Affidavit of Correction recorded as 2004-1145385, records of Maricopa County, Arizona.

http://www.maricopa.gov/records.aspx?id=4204120100001024 pages

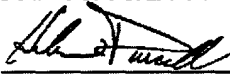
http://recorder.maricopa.gov/cert.aspx?id=42647 201000035162 4 pages

20100035162
OFFICIAL RECORDS OF
MARICOPA COUNTY RECORDER
HELEN PURCELL



The foregoing instrument is an
electronically prepared
full, true and correct copy
of the original record in this
office.

Attest: 06/08/2011 05:35:08 PM

By  Recorder

To verify this purchase visit
<http://recorder.maricopa.gov/cert.aspx?id=42647>

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EXHIBIT 4

DECLARATION OF PAULA GRUNTMEIR

I, PAULA GRUNTMEIR, states as follows:

1. I am an employee of Tiffany & Bosco P.A. in Phoenix, Arizona, and I make this Declaration under oath in connection with my appeal of the Arizona Secretary of State's February 24, 2012, Decisions suspending my notary commission for 60 days because, almost two years ago, I used a notary acknowledgement form that mixed my e-notary and regular notary information.
2. In or about early 2008, Tiffany & Bosco was approached by the Maricopa County Recorder's Office and was asked to participate in a pilot project at the Recorder's Office dealing with electronic filing and recording of certain routine legal documents. Tiffany & Bosco was asked to participate because our firm files and records thousands of documents each year in the Recorder's Office, and Tiffany & Bosco was informed that the County said that our cooperation in the pilot project would potentially save the County Recorder substantial amounts of money.
3. Tiffany & Bosco's contact at the Recorder's Office for this pilot project was Cathy Lucero, who I believe holds the title of Customer Service Program Manager. As I understand it, we took all of our direction either from Cathy Lucero or from the outside vendors chosen by the County Recorder to help implement the project, particularly Chosen Security. There was a great deal of confusion at times as to how the project would operate, and in particular how electronic notarization of documents would be performed. Indeed, it took a year or more to get the project underway.
4. During the start-up phase of the project, Tiffany & Bosco sent a form of e-notary acknowledgement (similar to that attached hereto as **Exhibit 1**) to Cathy Lucero and asked her to approve that as the form to be used. Cathy Lucero approved that form of acknowledgement, and therefore that form of acknowledgement was used as the pilot project got underway in May 2009. This was altogether new to us at that time, and we were relying mainly on the Recorder's Office and its outside vendors for direction.

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5. On May 7, 2010 -- approximately a year after the pilot project was underway -- I received a call from a woman by the name of Holly at the Secretary of State's Office. Holly identified herself as a Supervisor in the Notary Section of the Secretary of State's office. I do not recall Holly's last name, but I recorded her phone number (602-542-6181). Holly explained to me at that time that her office was doing an audit relating to e-notarization, and that she had observed that documents that I had e-notarized contained the expiration date of my regular notary but should instead contain the expiration date of my e-notary certification. Although I did not make a formal record of the call from Holly, attached as **Exhibit 2** is a contemporaneous e-mail of another person in our office that summarized what I told her about the call.
6. Based on this call from Holly, Tiffany & Bosco promptly took steps to change the e-notary format on our documents being filed and recorded as part of the County Recorder's pilot project. It is my understanding that these changes required modifications to the firm's computer system, and that it was done as quickly as possible. I am further informed that documents filed after approximately May 20, 2010 had been changed to show on my e-notary acknowledgement the expiration date of my e-notary certification. At that same time, the format was also changed to reflect my e-signature rather than my notary stamp. A copy of the format that was used once these changes were made in late May 2010 is attached hereto as **Exhibit 3**.
7. Because of numerous complications, confusion and misunderstandings associated with the County Recorder's pilot project, Tiffany & Bosco ceased e-filing and e-recording most of its legal documents in approximately July 2011.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

EXECUTED on this 9th day of March, 2012.

By: 
Paula Gruntmeir